

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION

IN RE:

SCOTT PETTIT  
TABITHA PETTIT  
DEBTORS

}  
}  
}

CASE NO. 11-90665-BHL-13

**MOTION TO MODIFY DEBTORS' CHAPTER 13 PLAN**  
**AND NOTICE OF OBJECTION DEADLINE**

Come now the above-captioned Debtors by Counsel, and files his Motion to Modify Debtors' Chapter 13 Plan. In support of this Motion, Counsel for the Debtors state as follows:

1. Pursuant to an Agreed Entry Resolving Trustee's Objection to GMAC Mortgage's proof of claim, the Debtors propose to extend their plan from 60 months to 66 months. The claims held by GMAC Mortgage, LLC shall be unsecured claims.
2. The Debtors shall pay no less than \$100,484.75 to unsecured creditors.
3. The Debtors propose to cure their pending plan delinquency up through December, 2012 by the subject amendment to the plan.

WHEREFORE, the Debtors by Counsel, request the Court to modify their plan by extending the plan from 60 months to 66 months; the Debtors' shall continue to deliver payments in the amount of \$2,484.44 per month.

Dated this 30th day of January, 2013.

KOEHLER LAW OFFICE

By: 

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William P. Harbison  
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/s/ Scott Pettit

SCOTT PETTIT

/s/ Tabitha Pettit

TABITHA PETTIT

**NOTICE IS GIVEN THAT** any Objection must be filed with the Bankruptcy Clerk within **21 days** from the date of service [or such other time period as may be permitted by Fed.R.Bankr.P.9006(f)]. Those not required or not permitted to file electronically must deliver any objection by U.S. mail, courier, overnight/express mail, or in person at:

U.S. Bankruptcy Court  
110 U.S. Courthouse  
121 W. Spring Street  
New Albany, Indiana 47150

The objecting party must ensure delivery of the objection to the party filing the motion, (the Trustee – if not the movant or the objector) (and the Debtor – if not the movant or the objector). **If an objection is NOT timely filed, the requested relief may be granted.**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 30<sup>th</sup> day of January, 2013 a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Joseph M. Black, Jr., Chapter 13 Trustee: [jmbecf@trustee13.com](mailto:jmbecf@trustee13.com)  
U.S. Trustee: [ustpreion10.in.ecf@usdoj.gov](mailto:ustpreion10.in.ecf@usdoj.gov)

I further certify that a true copy of the foregoing Motion to Modify was sent via U.S. Mail this 30<sup>th</sup> day of January, 2013 to all parties attached hereto:

  
WILLIAM P. HARBISON

Label Matrix for local noticing  
0756-4  
Case 11-90665-BHL-13  
Southern District of Indiana  
New Albany  
Wed Jan 30 14:54:54 EST 2013

BRCLYSBANKDE  
P.O. B 8803  
WILMINGTON, DE 19899-8803

CAP ONE  
POB 30281  
SALT LAKE CITY, UT 84130-0281

EAF LLC  
1120 WEST LAKE CO  
SUITE B  
BUFFALO GROVE, IL 60089-1970

GE Money Bank  
c/o B-Line, LLC  
MS 550  
PO Box 91121  
Seattle, WA 98111-9221

GEMB/WALMART  
PO BOX 981400  
EL PASO, TX 79998-1400

GMAC MORT.  
3451 HAMMOND AVE  
PO BOX 4622  
WATERLOO, IA 50704-4622

HSBC Bank Nevada, N.A.  
by PRA Receivables Management, LLC  
PO Box 12907  
Norfolk VA 23541-0907

Jennings Superior Court  
40D01-1012-CC-394  
POB 490  
Vernon, IN 47282-0490

Koehler Law Office  
400 Pearl St Suite 200  
New Albany, IN 47150-3451

Asset Acceptance LLC  
PO Box 2036  
Warren, MI 48090-2036

Bowman, Heintz, Boscia & Vician, PC  
8605 Broadway  
Merrillville, IN 46410-5598

CITI-SHELL  
PO BOX 6497  
SIOUX FALLS, SD 57117-6497

FUNANC/GEMB  
PO BOX 981439  
EL PASO, TX 79998-1439

GE Money Bank  
c/o Recovery Management Systems Corporat  
25 SE 2nd Ave Suite 1120  
Miami FL 33131-1605

GEMB/WLMRTDC  
PO BOX 981471  
EL PASO, TX 79998-1471

GMAC Mortgage, LLC as servicer for GMAC Mort  
GMAC Mortgage, LLC  
Attn: Bankruptcy Department  
1100 Virginia Drive  
Ft. Washington, PA 19034-3204

InSolve Recovery, LLC, as assignee of GE Cap  
c/o Capital Recovery Group, LLC  
1790 E. River Road, Ste. 101  
Tucson, AZ 85718-5958

Julia M. Pike  
Counsel for plaintiff  
204 East Market Street  
Louisville, KY 40202-1218

MAIN STREET  
2877 PARADISE RD  
SUITE 303  
LAS VEGAS, NV 89109-5239

BACK BOWL I LLC  
C O WEINSTEIN AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121-3132

CANDICA L.L.C.  
C O WEINSTEIN AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121-3132

Capital One Bank (USA), N.A.  
PO Box 12907  
Norfolk, VA 23541-0907

(p)FRONTIER COMMUNICATIONS  
BANKRUPTCY DEPT  
19 JOHN STREET  
MIDDLETOWN NY 10940-4918

GEMB/JCP  
PO BOX 981402  
EL PASO, TX 79998-1402

GEMBLOWBRC  
PO BOX 981400  
EL PASO, TX 79998-1400

HSBC BANK  
PO BOX 5253  
CAROL STREAM, IL 60197-5253

Jennings Circuit Court  
40C01-1012-CC-426  
POB 385  
Vernon, IN 47282-0385

KY TELCO CU  
PO Box 18303  
Louisville, KY 40261-0303

MIDLAND CRED  
8875 AERO DR  
SUITE 200  
SAN DIEGO, CA 92123-2255

Midland Credit Management, Inc.  
8875 Aero Drive, Suite 200  
San Diego, CA 92123-2255

Midland Funding LLC  
by American InfoSource LP as agent  
PO Box 4457  
Houston, TX 77210-4457

OAK HARBOR CAPITAL II LLC  
C O WEINSTEIN AND RILEY, PS  
2001 WESTERN AVENUE, STE 400  
SEATTLE, WA 98121-3132

PORTFOLIO RC  
287 INDEPENDENCE  
VIRGINIA BEACH, VA 23462-2962

Portfolio Investments I LLC  
c/o Recovery Management Systems Corp  
25 SE 2nd Avenue Suite 1120  
Miami, FL 33131-1605

Portfolio Investments I LLC  
c/o Recovery Management Systems Corporat  
25 SE 2nd Avenue Suite 1120  
Miami FL 33131-1605

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

The Boyd's Collection LTD  
75 Cunningham Rd.  
Gettysburg, PA 17325-7142

U.S. Trustee  
101 W. Ohio St.. Ste. 1000  
Indianapolis, IN 46204-1982

Joseph M. Black Jr  
PO Box 846  
Seymour, IN 47274-0846

Lloyd E Koehler5  
400 Pearl Street Ste 200  
New Albany, IN 47150-3451

Scott Pettit  
380 S Co Rd 150 W  
North Vernon, IN 47265-7134

Tabitha Pettit  
380 S Co Rd 150 W  
North Vernon, IN 47265-7134

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Frontier Communication  
Bankruptcy Department  
11799 N. College Ave  
Carmel, IN 46032

Portfolio Recovery Associates, LLC  
POB 12914  
Norfolk VA 23541

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)GMAC Mortgage, LLC

End of Label Matrix  
Mailable recipients  
Bypassed recipients  
Total

42-38  
1  
43-39